

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

NORTH CAROLINA MUTUAL LIFE
INSURANCE COMPANY,

Plaintiff,

v.

STAMFORD BROOK CAPITAL, LLC,
et al,

Defendants.

No. 1:16-cv-1174-LCB-JEP

**EMERGENCY JOINT MOTION TO
CANCEL/WITHDRAW WRITS OF HABEAS CORPUS AD TESTIFICANDUM**

Defendant Bradley Carl Reifler, by and through undersigned counsel, and Plaintiff, North Carolina Mutual Life Insurance Company, by and through undersigned counsel, do hereby jointly move this Honorable Court to Cancel/Withdraw the *Writs of Habeas Corpus ad Testificandum*, Doc. Nos. 297, 298, 299 (the “Writs”), entered October 17, 2024. In support, the parties show as follows:

The final pretrial conference is scheduled for November 20, 2024, and the trial is scheduled for December 3, 2024. The parties have reached a settlement regarding this case that will obviate the need for Mr. Reifler—currently imprisoned at FCI Lewisburg—to be removed from that facility and transported to the Middle District of North Carolina pursuant to the Writs. By separate Motion, filed contemporaneously herewith, the parties are alerting the Court that they have reached a settlement in principle with respect to all

claims and all issues asserted in this case, and they are accordingly, and jointly moving, to continue the November 20, 2024, final pretrial conference and December 3, 2024 trial to allow the parties time to finalize the necessary documents to be filed with this Court.

This Motion is filed as an EMERGENCY MOTION because it is believed that the Bureau of Prisons will be imminently removing Mr. Reifler from FCI Lewisburg and transporting him to the Middle District of North Carolina. Once Mr. Reifler is removed from FCI Lewisburg, he is likely to lose substantial credits he has earned through his participation in the Residential Drug Abuse Program (RDAP), and potentially other earned First Step Act and Second Chance Act credits. A proposed Order is attached.

WHEREFORE, the parties jointly request the Court grant this EMERGENCY MOTION to Cancel/Withdraw the *Writs of Habeas Corpus ad Testificandum*, Doc. Nos. 297, 298, 299, and to further Order that a copy of the Order be immediately served upon the Warden at FCI Lewisburg, at 2400 Robert F. Miller Drive, Lewisburg, PA 17837.

Respectfully submitted, this the 29th day of October, 2024.

BELL, DAVIS & PITT, P.A.

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